

EXHIBIT 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, JULIEANNA)
MUNIZ, ELIZA CAMBAY, SAL) Case No.:
CATALDO, EMIR GOENAGA, JULIAN) 3:20-cv-04688
SANTIAGO, HAROLD NYANJOM, KELLIE)
NYANJOM, and SUSAN LYNN HARVEY,)
individually and on behalf of all)
others similarly situated,)
)
Plaintiffs,)
vs.)
)
GOOGLE LLC,)
)
Defendant.)
-----)

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REMOTE PROCEEDINGS OF THE
VIDEOTAPED DEPOSITION OF CHRISTOPHER RUEMMLER
FRIDAY, SEPTEMBER 9, 2022

REPORTED BY NANCY J. MARTIN
CSR. NO. 9042, RMR, RPR
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1 do with -- it's a control for the Assistant. One of
2 those As is Assistant. I don't know what the whole
3 thing means. Or I don't remember what the whole thing
4 means. At one point I probably did, but like it's
5 been a while.

6 Q. Can we refer to it as SAA? Does that make
7 sense?

8 A. Yeah. SAA makes sense, yeah.

9 Q. Do you know what specifically SAA controls
10 with respect to the Google Assistant?

11 A. There is lots of different control events,
12 and I'm not sure if I remember exactly what SAA
13 controls.

14 Q. Why did you E-mail this question to Grace, as
15 opposed to someone else?

16 A. Because -- I E-mailed this question to Grace
17 because I was probably concerned about G Suite SAA.

18 Q. What is G Suite SAA?

19 A. G Suite SAA is G Suite's version of SAA. We
20 talked about Dasher before. So sometimes when we say
21 G Suite or we say Workspace, we mean the enterprise
22 part of it. So G Suite SAA was for the enterprise
23 control for enterprise users.

24 Q. I believe I might have asked this question,
25 but can you just remind me, what is an enterprise

1 user?

2 A. An enterprise user is one that pays Google
3 money to host their Workspace environment. And we
4 have various features of Workspace, like legal
5 discovery is one of them, right, you know, that you
6 can use.

7 Q. Okay. Can you look up at the second page.
8 Sorry. Let's go back to the first page.

9 A. Okay.

10 Q. At the very bottom.

11 A. Uh-huh.

12 Q. Do you see how you wrote an E-mail on
13 Wednesday, August 5, 2020 at 10:27 p.m.?

14 A. Okay. At the very bottom again?

15 Q. Yes. If you go to the next page, do you see
16 where you wrote, "Let me see if I can summarize the
17 bits today"?

18 A. Okay. Yeah.

19 Q. Do you see where you wrote, "WAA completely
20 broken, no way for the user to determine what this
21 actually controls. Both admin and user controlled,
22 but neither will understand what it actually does."

23 Do you see that?

24 A. Uh-huh.

25 Q. What did you mean by "admin"?

1 A. "Admin" here means the G Suite admin for the
2 G Suite customer. So G Suite, we are a -- the admin
3 is basically the controller of the G Suite, you know,
4 the users; right? Their employees. So you can think
5 of Google as a G Suite customer, and Google has
6 employees, and the admin of Google is the one that can
7 control certain settings for the employees.

8 Q. And that could be the case at other companies
9 too, not just Google. Fair?

10 A. Right. All companies that use G Suite as
11 enterprise customer have admins.

12 Q. So does that mean that admin can decide
13 whether or not to switch WAA on or off for all of the
14 users?

15 A. That is correct. And it has that control.

16 Q. Can the admin override the user's choice?

17 A. For WAA, that is true.

18 Q. So if a user wants to turn WAA off, the admin
19 can turn WAA back on?

20 A. That, I believe is not true. I don't believe
21 the -- I'm not 100 percent sure, but I don't believe
22 the admin can force WAA on users that want it off.
23 But I can't be 100 percent certain.

24 Q. Now, where you wrote that "no way for the
25 user to determine what this actually controls," what

C E R T I F I C A T E

I do hereby certify that the aforesaid testimony was taken before me, pursuant to notice, at the time and place indicated; that said deponent was by me duly sworn to tell the truth, the whole truth, and nothing but the truth; that the testimony of said deponent was correctly recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided transcription; that the deposition is a true and correct record of the testimony given by the witness; and that I am neither of counsel nor kin to any party in said action, nor interested in the outcome thereof.



Nancy J. Martin, RMR, CSR

Dated: September 15, 2022

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